

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

BRITTANY E. MARTIN,

Case No.: 1:24-cv-00072

Plaintiff,

HON. Hala Y. Jarbou

v.

Magistrate Ray Kent

HENN LESPERANCE PLC, et al.,

Defendants.

Brittany E. Martin
Plaintiff in Pro Se
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*****EXPEDITED CONSIDERATION REQUESTED*****

**PLAINTIFF'S MOTION FOR LEAVE TO EXCEED WORD COUNT LIMIT
IN RESPONSE TO DEFENDANTS' MOTION TO STRIKE AND SEAL
PLAINTIFF'S FIRST AMENDED COMPLAINT**

Pursuant to W.D. Mich. LCivR 7.1(c), Plaintiff Brittany E. Martin seeks this Court's permission to file a response to Defendants' Motion to Strike and Seal Plaintiff's First Amended Complaint (ECF No. 75) that exceeds the 4,300-word count limit set by W.D.

Mich. LCivR 7.3(b)(i). In support of her Motion, Ms. Martin relies on her accompanying Brief in Support and states the following:

An enlargement of this Court's typical 4,300 word-count limit is necessary to enable Ms. Martin to fully and effectively respond to the numerous broad and sweeping arguments raised by Defendants in their motion.

Good cause exists to allow Ms. Martin to file a response that exceeds the typical word-count limit of W.D. Mich. LCivR 7.3(b)(i) because it will allow a complete and fair presentation of the issues. This will ensure that the Court can accurately and effectively adjudicate the issues on the merits, thus serving the interest of justice and promoting judicial economy.

Allowing Ms. Martin to file a response that exceeds the typical word-count limit of W.D. Mich. LCivR 7.3(b)(i) will not unduly delay the proceedings or prejudice Defendants.

In accordance with W.D Mich. LCivR 5.7(f), Ms. Martin's proposed Response in Opposition to Defendants' Motion to Strike and Seal the Amended Complaint is attached as **EXHIBIT A**. The proposed Response is 5,088 words, including headings, footnotes, citations, and quotations.

WHEREFORE, Plaintiff Ms. Martin respectfully requests that this Honorable Court grant her permission to exceed the word-count limit for her Response in Opposition to Defendants' Motion to Strike and Seal Plaintiff's First Amended Complaint and accept the same for filing, in the alternative, if the Court denies this request, in whole or in part, Ms. Martin respectfully requests 7 days to file a shorter brief in compliance with the word

count specified by the Court, and grant her any other relief this Court deems just and proper.

Respectfully submitted,

Brittany E. Martin
Plaintiff

Dated: July 10, 2024

By: /s/ Brittany E. Martin
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